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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KAREN M. BAUER, Individually and)	Case No. 2:09-cv-01120-JLL-CCC
on Behalf of All Others Similarly)	
Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	NOTICE OF MOTION OF KAREN M.
)	BAUER AND ANTHONY
vs.)	SALVATORE FOR
)	CONSOLIDATION OF RELATED
PRUDENTIAL FINANCIAL, INC.,)	ACTIONS, APPOINTMENT AS
ARTHUR F. RYAN, RICHARD J.)	LEAD PLAINTIFFS AND
CARBONE, PETER B. SAYRE,)	APPROVAL OF SELECTION OF
DENNIS G. SULLIVAN, FREDERIC)	COUNSEL
K. BECKER, GORDON M.)	
BETHUNE, GASTON CAPERTON,)	
GILBERT F. CASELLAS, JAMES G.)	
<u>CULLEN, WILLIAM H. GRAY III,</u>)	

JON F. HANSON, CONSTANCE J.)
HORNER, KARL J. KRAPEK, JAMES)
A. UNRUH, CITIGROUP GLOBAL)
MARKETS INC., MERRILL LYNCH,)
PIERCE, FENNER & SMITH)
INCORPORATED, MORGAN)
STANLEY & CO. INCORPORATED,)
UBS SECURITIES LLC, WACHOVIA)
CAPITAL MARKETS, LLC, BANC)
OF AMERICA SECURITIES LLC,)
RBC CAPITAL MARKETS)
CORPORATION, J.P. MORGAN)
SECURITIES INC. and)
PRICewaterhouseCOOPERS)
LLP,)
)
Defendants.)
)
_____)

WARREN PINCHUK, Individually and)
on Behalf of All Others Similarly)
Situating,)

Plaintiff,)

vs.)

PRUDENTIAL FINANCIAL, INC.,)
FREDERIC K. BECKER, GORDON)
M. BETHUNE, GASTON)
CAPERTON, GILBERT F.)
CASELLAS, JAMES G. CULLEN,)
WILLIAM H. GRAY III, JON F.)
HANSON, CONSTANCE J. HORNER,)
KARL J. KRAPEK, ARTHUR F.)
RYAN, PETER B. SAYRE, DENNIS)
G. SULLIVAN, JAMES A. UNRUH,)
CITIGROUP GLOBAL MARKETS)
INC., MERRILL LYNCH, PIERCE,)
FENNER & SMITH)
INCORPORATED, MORGAN)
_____)

Case No. 2:09-cv-01758-JLL-CCC

STANLEY & CO. INCORPORATED,)
UBS SECURITIES LLC, WACHOVIA)
CAPITAL MARKETS, LLC, BANC)
OF AMERICA SECURITIES LLC,)
RBC CAPITAL MARKETS)
CORPORATION, J.P. MORGAN)
SECURITIES INC. and)
PRICewaterhouseCOOPERS)
LLP,)
)
Defendants.)

NOAH HADDOCK, Individually and)
on Behalf of All Others Similarly)
Situated,)

Plaintiff,)

vs.)

PRUDENTIAL FINANCIAL, INC.,)
ARTHUR F. RYAN, RICHARD J.)
CARBONE, PETER B. SAYRE,)
DENNIS G. SULLIVAN, FREDERIC)
K. BECKER, GORDON M.)
BETHUNE, W. GASTON)
CAPERTON, III, GILBERT F.)
CASELLAS, JAMES G. CULLEN,)
WILLIAM H. GRAY, III, JON F.)
HANSON, CONSTANCE J. HORNER,)
KARL L. KRAPEK, JAMES A.)
UNRUH, CITIGROUP GLOBAL)
MARKETS INC., MERRILL LYNCH,)
PIERCE, FENNER & SMITH)
INCORPORATED, MORGAN)
STANLEY & CO. INCORPORATED,)
UBS SECURITIES LLC, WACHOVIA)
CAPITAL MARKETS, LLC, BANC)
OF AMERICA SECURITIES LLC,)
RBC CAPITAL MARKETS)

Case No. 2:09-cv-01771-JLL-CCC

CORPORATION, J.P. MORGAN)
SECURITIES INC. and)
PRICEWATERHOUSECOOPERS,)
LLP,)
)
Defendants.)
)

PLEASE TAKE NOTICE that Karen M. Bauer and Anthony Salvatore, by their counsel, will move this Court, on June 15, 2009 or on such other date and time as may be designated by the Court, for an Order in the form submitted herewith: (i) consolidating the related actions pending in this District; (ii) appointing Karen M. Bauer and Anthony Salvatore as Lead Plaintiffs; (iii) approving Karen M. Bauer's and Anthony Salvatore's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and the law firm of Cohn Lifland Pearlman Herrmann & Knopf LLP to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Karen M. Bauer and Anthony Salvatore submit herewith a Memorandum of Law and Declaration of Peter S. Pearlman, dated May 11, 2009.

DATED: May 11, 2009

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN

s/ Peter S. Pearlman

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